San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

JUL 12 2016

Ms. Helen Ordway
Alon Bakersfield Refining
6451 Rosedale Hwy
Bakersfield, CA 93308

Re: Proposed Authority to Construct/Certificate of Conformity (Minor Mod)
District Facility # S-33
Project # Project S-1161932

Dear Ms. Ordway:

Enclosed for your review is the District's analysis of an application for Authority to Construct for the facility identified above. You requested that a Certificate of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. The Authority to Construct (ATC) will designate the Area 1 flare permit, S-33-18, as a compliant dormant emissions unit.

After addressing all comments made during the 45-day EPA comment period, the District intends to issue the Authority to Construct with a Certificate of Conformity. Prior to operating with modifications authorized by the Authority to Construct, the facility must submit an application to modify the Title V permit as an administrative amendment, in accordance with District Rule 2520, Section 11.5.

If you have any questions, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Thank you for your cooperation in this matter.

Sincerely,

for Arnaud Marjollet
Director of Permit Services

Enclosures

cc: Gerardo C. Rios, EPA (w/enclosure) via email

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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San Joaquin Valley Air Pollution Control District
Dormant Emissions Unit

Facility Name:	Alon Bakersfield Refining	Date:	July 6, 2016
Mailing Address:	6451 Rosedale Hwy Bakersfield, CA 93308	Engineer:	Robert Rinaldi
		Lead Engineer:	Steve Leonard
Contact Person:	Helen Ordway		
Telephone:	(661) 326-4422		
Application #:	S-33-18-12		
Project #:	S-1161932		
Complete:	June15, 2016		

7/11/16

I. Proposal

Alon Bakersfield Refining is requesting an Authority to Construct (ATC) to designate the Area 1 flare permit as a compliant dormant emissions unit (DEU). The applicant proposes to disconnect the flare from all the equipment it serves and the pilot gas line to ensure that the equipment does not operate while dormant.

Pursuant to District GEAR Policy, this application is administrative and not subject to District Rule 2201, *New and Modified Stationary Source Review Rule*.

Alon Bakersfield Refining received their Title V Operating Permit on 2/28/2003. This modification can be classified as a Title V minor modification pursuant to Rule 2520, Section 3.20, and could be processed with a Certificate of Conformity (COC). However, the facility has requested that this project be processed in that manner.

Since the facility has specifically requested that this project be processed in that manner, the 45-day EPA comment period will be satisfied prior to the issuance of the ATC(s), and the facility must apply to administratively amend their Title V Operating Permit to include the requirements of the ATC(s) issued with this project.

II. Applicable Rules

Rule 1070 Inspections (12/17/92)
Rule 2010 Permits Required (12/17/92)
Rule 2080 Conditional Approval (12/17/92)
Rule 2520 Federally Mandated Operating Permits (6/21/01)

III. Project Location

The project is located at 6451 Rosedale Hwy (Area 1 & 2), Bakersfield.

IV. Process Description

The flare gas vapor recovery recovers gases directed to the Area 1 flare (S-33-18) under routine conditions. While S-33-18 is dormant, flare gas will go to the Area 2 low pressure flare (S-33-65).

V. Equipment Listing

Pre-Project Equipment Description

S-33-18-10:
AREA 1 FLARE (74Y-1, NORTH) W/AUTOMATIC STEAM INJECTION CONTROL, KNOCKOUT DRUM, CHEMICAL INJECTION H2S REMOVAL SYSTEM CONNECTED TO FLARE GAS SUPPLY LINE, & WATER SEAL DRUM DOWNSTREAM OF FLARE KNOCKOUT DRUM

Proposed Modification

S-33-18-12:
MODIFICATION OF AREA 1 FLARE (74Y-1, NORTH) W/AUTOMATIC STEAM INJECTION CONTROL, KNOCKOUT DRUM, CHEMICAL INJECTION H2S REMOVAL SYSTEM CONNECTED TO FLARE GAS SUPPLY LINE, & WATER SEAL DRUM DOWNSTREAM OF FLARE KNOCKOUT DRUM: DESIGNATE AS A COMPLIANT DORMANT EMISSIONS UNIT

Post-Project Equipment Description

S-33-18-12:
AREA 1 FLARE (74Y-1, NORTH) W/AUTOMATIC STEAM INJECTION CONTROL, KNOCKOUT DRUM, CHEMICAL INJECTION H2S REMOVAL SYSTEM CONNECTED TO FLARE GAS SUPPLY LINE, & WATER SEAL DRUM DOWNSTREAM OF FLARE KNOCKOUT DRUM

VI. Emission Control Technology Evaluation

There are no proposed physical changes to the equipment or any change in permitted emissions. Therefore there is no need to evaluate the emission control technology.

VII. General Calculations

Since this project is not subject to Rule 2201, calculations are not required.

VIII. Compliance

- {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2520] Y
- {1831} Prior to operating with modifications authorized by this Authority to Construct, the permittee shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Y

While the equipment is dormant, the established leak testing and pilot fuel will not be required. Whenever the operator designates the equipment as active, the established requirements will resume.

Nothing in this evaluation shall be construed to shield a unit that has operated out of compliance with any District, state or federal requirements. A unit designated as a DEU is subject to enforcement action for any and all violations.

The following conditions are listed on the permit to ensure compliance.

- {4561} While dormant, the flare shall be disconnected from all the equipment it serves and the pilot gas line shall be disconnected. [District Rule 2080]
- {4562} Permittee shall submit written notification to the District upon designating the unit as dormant or active. [District Rule 2080]
- {4560} While dormant, normal source testing shall not be required. [District Rule 2080]
- {4563} Upon recommencing operation of this unit, normal source testing shall resume. [District Rule 2080]
- {4564} Any source testing required by this permit shall be performed within 60 days of recommencing operation of this unit, regardless of whether the unit remains active or is again designated as dormant. [District Rule 2080]
- {4565} Records of all dates and times that this unit is designated as dormant or active, and copies of all corresponding notices to the District, shall be maintained, retained for a period of at least five years, and made available for District inspection upon request. [District Rule 1070]

IX. California Environmental Quality Act (CEQA)

CEQA requires each public agency to adopt objectives, criteria, and specific procedures consistent with CEQA Statutes and the CEQA Guidelines for administering its responsibilities under CEQA, including the orderly evaluation of projects and preparation of environmental documents. The San Joaquin Valley Unified Air Pollution Control District (District) adopted its *Environmental Review Guidelines* (ERG) in 2001.

The basic purposes of CEQA are to:

- Inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities.
- Identify the ways that environmental damage can be avoided or significantly reduced.
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible.
- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

Consistent with CEQA and CEQA Guidelines requirements, the District has adopted procedures and guidelines for implementing CEQA. The District's ERG establishes procedures for avoiding unnecessary delay during the District's permitting process while ensuring that significant environmental impacts are thoroughly and consistently addressed. The ERG includes policies and procedures to be followed when processing permits for projects that are exempt under CEQA.

The State Legislature granted a number of exemptions from CEQA, including projects that require only ministerial approval. Based upon analysis of its own laws and consideration of CEQA provisions, the District has identified a limited number of District permitting activities considered to be ministerial approvals. As set forth in §4.2.1 of the ERG, projects permitted consistent with the District's *Guidelines for Expedited Application Review* (GEARs) are standard application reviews in which little or no discretion is used in issuing ATC documents.

For the proposed project, the District performed an Engineering Evaluation (this document) and determined that the project qualifies for processing under the procedures set forth in the District's GEARs. Thus, as discussed above, this issuance of such ATC(s) is a ministerial approval for the District and is not subject to CEQA provisions.

Indemnification Agreement/Letter of Credit Determination

According to District Policy APR 2010 (CEQA Implementation Policy), when the District is the Lead or Responsible Agency for CEQA purposes, an indemnification agreement and/or a letter of credit may be required. The decision to require an indemnity agreement and/or a letter of credit are based on a case-by-case analysis of a particular project's potential for litigation risk, which in turn may be based on a project's potential to generate public concern, its potential for significant impacts, and the project proponent's ability to pay for the costs of litigation without a letter of credit, among other factors.

As described above, the project requires only ministerial approval, and is exempt from the provisions of CEQA. As such, an Indemnification Agreement or a Letter of Credit will not be required for this project in the absence of expressed public concern.

X. Recommendation

Issue ATC S-33-18-12 subject to the permit conditions listed on the attached draft ATC in Appendix C.

XI. Billing Information

Billing Schedule			
Permit Number	Fee Schedule	Fee Description	Fee Amount
S-33-18-12	3020-2-H	> 15.0 MMBtu/hr	$1128

Appendixes
A: Current PTO
B. Compliance Certification Form
C: Draft ATC

Appendix A
Current PTO

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-33-18-10 **EXPIRATION DATE:** 08/31/2016

SECTION: 27 **TOWNSHIP:** 29S **RANGE:** 27E

EQUIPMENT DESCRIPTION:
AREA 1 FLARE (74Y-1, NORTH) W/AUTOMATIC STEAM INJECTION CONTROL, KNOCKOUT DRUM, CHEMICAL INJECTION H2S REMOVAL SYSTEM CONNECTED TO FLARE GAS SUPPLY LINE, & WATER SEAL DRUM DOWNSTREAM OF FLARE KNOCKOUT DRUM

PERMIT UNIT REQUIREMENTS

1. Flare gas inlet piping shall be equipped with a secondary hydrogen sulfide (H2S) removal system, including H2S scavenger chemical injection pumps, chemical storage/injection tank, piping, and pressure vessels. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Water seal drum located downstream of the flare knockout equipped with flare bypass piping to 2 compressors discharging to amine treater, unit #15 (S-33-14). At least one of the compressors shall be in operation whenever the flare is operational. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Permittee shall immediately notify the District of any change in manufacturer or formulation of scrubbing agents used at the secondary hydrogen sulfide (H2S) removal system, and shall submit MSDS for new scrubbing agent within one (1) week of change. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Leaks from valves and connectors associated with flare gas bypass equipment and subject to the provisions of Rule 4455 (Adopted 4/20/05) shall be defined as a reading of methane on a portable hydrocarbon detection instrument in excess of 100 ppmv above background when measured one (1) cm from potential source. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Leaks from pump and compressor seals associated with flare gas bypass equipment and subject to the provisions of Rule 4455 (Adopted 4/20/05) shall be defined as a reading of methane on a portable hydrocarbon detection instrument in excess of 500 ppmv above background when measured one (1) cm from potential source. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Permittee shall maintain accurate records of number of fugitive emissions components and calculated fugitive emissions using U.S. EPA publication 453/R-95-017, section 2.3.1, and a control efficiency of 95% for pumps and compressor seals and a control efficiency of 99% for valves and connectors for all components subject to the 100 and 500 ppmv fugitive leak criteria. [District Rule 1070 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
7. Flare gas bypass compressors shall be designated, as described in section 60.486(e) (1) and (2) for no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background. The reading shall be measured by the methods specified in section 60.485(c). Compressors shall be tested initially, annually thereafter, and at other times as requested by the District. [District Rule 4001, Subpart GGG] Federally Enforceable Through Title V Permit
8. During normal operation, sour gas (H2S content greater than 0.1 gr/dscf) must be diverted from the flare by the water seal drum and directed to the Area 1 or Area 3 amine treatment unit. Sweet refinery fuel gas (0.1 gr/dscf or less) may be introduced to the flare downstream of the water seal prior to the flow meter and hydrogen sulfide analyzer. [District Rule 2010] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

9. Emissions from the flare shall not exceed 0.068 lb/MMBtu for NOx. [District NSR Rule] Federally Enforceable Through Title V Permit
10. All records required by this permit shall be maintained on site for period of at least five years and shall be made available for District inspection upon request. [District Rule 1070 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
11. Operator shall report all rolling 3-hour periods during which the average concentration of H2S as measured by the H2S continuous monitoring system exceeds 0.10 gr/dscf (230 mg/dscm). [40 CFR Part 60, subpart J, 60.105(e)(3)(ii)] Federally Enforceable Through Title V Permit
12. Operator shall determine compliance with the H2S standard using EPA Method 11. [40 CFR Part 60, subpart J, 60.106(e)] Federally Enforceable Through Title V Permit
13. Sulfur content (as H2S) of fuel gas, as defined in Rule 4001 Subpart J, burned in flare shall not exceed 0.10 gr/dscf. [40 CFR 60, Subpart J] Federally Enforceable Through Title V Permit
14. Continuous emissions monitoring system shall be installed, calibrated, operated, and reported according to EPA guidelines as specified under 40 CFR 60, Subpart J, Specification 7, and general requirements. CEM results shall be calculated on a rolling three (3) hour basis. [40 CFR 60, Subpart J] Federally Enforceable Through Title V Permit
15. Visible emissions monitoring shall be conducted at least annually, using EPA Method 22. [40CFR 60.18(f)(1)] Federally Enforceable Through Title V Permit
16. The flame shall be present at all times when combustible gases are vented through the flare. [District Rule 4311, 5.2 and 40CFR 60.18(c)(2)] Federally Enforceable Through Title V Permit
17. The outlet shall be equipped with an automatic ignition system, or, shall operate with a pilot flame present at all times when combustible gases are vented through the flare, except during purge periods for automatic-ignition equipped flares. [District Rule 4311, 5.3 and 40CFR 60.18(f)(2)] Federally Enforceable Through Title V Permit
18. Except for flares equipped with a flow-sensing ignition system, a heat sensing device such as a thermocouple, ultraviolet beam sensor, infrared sensor, or an equivalent device, capable of continuously detecting at least one pilot flame or the flare flame is present shall be installed and operated. [District Rule 4311, 5.4 and 40CFR 60.18(f)(2)] Federally Enforceable Through Title V Permit
19. Flares that use flow-sensing automatic ignition systems and which do not use a continuous flame pilot shall use purge gas for purging. [District Rule 4311, 5.5] Federally Enforceable Through Title V Permit
20. Open flares in which the flare gas pressure is less than 5 psig shall be operated in such a manner that meets the provisions of 40 CFR 60.18. [District Rule 4311, 5.6] Federally Enforceable Through Title V Permit
21. Flaring is prohibited unless it is consistent with an approved flare minimization plan (FMP), and all commitments listed in that plan have been met. This standard shall not apply if the APCO determines that the flaring is caused by an emergency and is necessary to prevent an accident, hazard or release of vent gas directly to the atmosphere. [District Rule 4311, 5.8] Federally Enforceable Through Title V Permit
22. The operator shall minimize sulfur dioxide flare emissions to less than 1.50 tons per million barrels of petroleum processing capacity, calculated as an average over one calendar year. [District Rule 4311, 5.9.1] Federally Enforceable Through Title V Permit
23. The operator shall monitor the vent gas flow to the flare with a flow measuring device. [District Rule 4311, 5.10] Federally Enforceable Through Title V Permit
24. The operator shall maintain and retain on-site for a minimum of five years, and made available to the APCO, ARB, and EPA a copy of the approved flare minimization plan, a copy of annual reports submitted to the District, and all applicable flare monitoring data collected as required by this permit. [District Rule 4311, 6.1] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

25. The operator of a flare subject to flare minimization shall notify the APCO of an unplanned flaring event within 24 hours after the start of the next business day or within 24 hours of their discovery, which ever occurs first. The notification shall include the flare source identification, the start date and time, and the end date and time. An "unplanned flaring event" is any flaring event that does not meet the definition of "planned flaring" as defined in District Rule 4311 (Amended June 18, 2009). [District Rule 4311, 6.2] Federally Enforceable Through Title V Permit

26. Effective on and after July 1, 2012, and annually thereafter, the operator of a flare subject to flare minimization shall submit an annual report to the APCO that summarizes all Reportable Flaring Events as defined in Section 3.0 that occurred during the previous 12 month period. The report shall be submitted within 30 days following the end of the twelve month period of the previous year. The report shall include, but is not limited to all of the following: the results of an investigation to determine the primary cause and contributing factors of the flaring event; any prevention measures considered or implemented to prevent recurrence together with a justification for rejecting any measures that were considered but not implemented; if appropriate, an explanation of why the flaring was an emergency and necessary to prevent accident, hazard or release of vent gas to the atmosphere, or where, due to a regulatory mandate to vent a flare, it cannot be recovered, treated and used as a fuel gas at the facility; and the date, time, and duration of the flaring event. [District Rule 4311, 6.2.2] Federally Enforceable Through Title V Permit

27. Effective on and after July 1, 2012, and annually thereafter, the operator of a flare subject to flare monitoring requirements shall submit an annual report to the APCO within 30 days following the end of each 12 month period. The report shall include the following: the total volumetric flow of vent gas in standard cubic feet for each day; hydrogen sulfide content, methane content, and hydrocarbon content of vent gas composition; if vent gas composition is monitored by a continuous analyzer or analyzers, average total hydrocarbon content by volume, average methane content by volume, and depending upon the analytical method used, total reduced sulfur content by volume or hydrogen sulfide content by volume of vent gas flared for each hour of the month; if the flow monitor used measures molecular weight, the average molecular weight for each hour of each month; for any pilot and purge gas used, the type of gas used, the volumetric flow for each day and for each month; and the means used to determine flow; flare monitoring system downtime periods, including dates and times; for each day and for each month provide calculated sulfur dioxide emissions; and a flow verification report for each flare subject to this rule. The flow verification report shall include flow verification testing. [District Rule 4311, 6.2.3] Federally Enforceable Through Title V Permit

28. Total hydrocarbon content and methane content of vent gas shall be determined using ASTM Method D 1945-96, ASTM Method UOP 539-97, EPA Method 18, or EPA Method 25A or 25B. [District Rule 4311, 6.3.4.1] Federally Enforceable Through Title V Permit

29. Vent gas flow shall be determined using a verification method recommended by the manufacturer of the flow monitoring equipment installed. [District Rule 4311, 6.3.5.2] Federally Enforceable Through Title V Permit

30. The operator shall monitor sulfur content of the vent gas to the flare using a colorimetric tube system on a daily basis, and monitor vent gas hydrocarbon on a weekly basis by collecting samples and having them tested. [District Rule 4311, 6.6.5] Federally Enforceable Through Title V Permit

31. The operator shall provide the APCO with access to the flare monitoring system to collect the vent gas samples. [District Rule 4311, 6.6.7] Federally Enforceable Through Title V Permit

32. The operator shall monitor the volumetric flows of the flare's purge and pilot gases with flow measuring devices or other parameters as specified on the Permit to Operate so that volumetric flows of pilot and purge gas may be calculated based on pilot design and the parameters monitored. [District Rule 4311, 6.7] Federally Enforceable Through Title V Permit

33. The operator shall monitor and record the water level and pressure of the water seal that services the flare daily. [District Rule 4311, 6.8] Federally Enforceable Through Title V Permit

34. The operator shall report periods of flare monitoring system inoperation greater than 24 continuous hours by the following working day, followed by notification of resumption of monitoring. Periods of inoperation of monitoring equipment shall not exceed 14 days per any 18-consecutive-month period. Periods of flare monitoring system inoperation do not include the periods when the system feeding the flare is not operating. [District Rule 4311, 6.9.1] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

35. The operator shall install and maintain equipment that records a real-time digital image of the flare and flame at a frame rate of no less than one frame per minute. The recorded image of the flare shall be of sufficient size, contrast, and resolution to be readily apparent in the overall image or frame. The image shall include an embedded date and time stamp. The equipment shall archive the images for each 24-hour period. In lieu of video monitoring the operator may use an alternative monitoring method that provides data to verify date, time, vent gas flow, and duration of flaring events. [District Rule 4311, 6.10] Federally Enforceable Through Title V Permit

36. The flare shall be operated according to the manufacturer's specifications, a copy of which shall be maintained on site. [District Rule 40CFR 60.18(d)] Federally Enforceable Through Title V Permit

37. The actual exit velocity of a flare shall be determined by dividing the volumetric flowrate (in units of standard temperature and pressure), as determined by Reference Methods 2, 2A, 2C, or 2D as appropriate; by the unobstructed (free) cross sectional area of the flare tip. [40 CFR 60.18 (f)(4)] Federally Enforceable Through Title V Permit

38. Air-assisted or steam-assisted flares shall only be used when the net heating value of the gas being combusted is 300 Btu/scf or greater. Nonassisted flares shall only be used when the net heating value of the gas being combusted is 200 Btu/scf or greater. [40 CFR 60.18 (c)(3)(ii)] Federally Enforceable Through Title V Permit

39. Steam-assisted and nonassisted flares shall be operated with an exit velocity less than 60 ft/sec, except as provided in 40 CFR 60.18 (c)(4)(ii) and (iii). [40 CFR 60.18 (c)(4)(i)] Federally Enforceable Through Title V Permit

40. Steam-assisted and nonassisted flares may be operated with an exit velocity equal to or greater than 60 ft/sec, but less than 400 ft/sec, if the net heating value of the gas being combusted is greater than 1,000 Btu/scf. [40 CFR 60.18 (c)(4)(ii)] Federally Enforceable Through Title V Permit

41. Steam-assisted and nonassisted flares may be operated with an exit velocity less than the velocity Vmax, as determined by the methods specified in 40 CFR 60.18 (f)(5), and less than 400 ft/sec. [40 CFR 60.18 (c)(4)(iii)] Federally Enforceable Through Title V Permit

42. The net heating value of the gas being combusted the flare shall be calculated pursuant to 40 CFR 60.18(f)(3) or by using EPA Method 18, ASTM D1946, and ASTM D2382 if published values are not available or cannot be calculated. [40 CFR 60.18 (f)(3)] Federally Enforceable Through Title V Permit

43. Except for complying with the applicable requirements of Sections 6.1 and 7.3, the requirements of this rule shall not apply to 1) components subject to Rule 4623 (adopted 5/19/05), 2) pressure relief devices, pumps, and compressors equipped with a closed vent system as defined in Section 3.0, 3) components buried below ground, 4) components exclusively handling liquid streams which have less than 10 percent by weight (<10 wt%) evaporation at 150 C, 5) components exclusively handling liquid streams with a VOC content less than ten percent by weight (<10 wt%), 6) components exclusively handling gas/vapor streams with a VOC content of less than one percent by weight (<1wt%), 7) components incorporated in lines exclusively in vacuum service, 8) components exclusively handling commercial natural gas, and 9) one-half inch nominal or less stainless steel tube fittings which have been demonstrated to the Air Pollution Control Officer (APCO) to be leak-free based on initial inspection. [District Rule 4455, 4.1 & 4.2] Federally Enforceable Through Title V Permit

44. The operator shall not use any component that leaks in excess of the allowable leak standards of this rule, or is found to be in violation of the provisions specified in Section 5.1.3. A component identified as leaking in excess of an allowable leak standard may be used provided it has been identified with a tag for repair, has been repaired, or is awaiting re-inspection after repair, within the applicable time period specified within the rule. [District Rule 4455, 5.1.1] Federally Enforceable Through Title V Permit

45. Each hatch shall be closed at all times except during sampling or adding of process material through the hatch, or during attended repair, replacement, or maintenance operations, provided such activities are done as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4455, 5.1.2] Federally Enforceable Through Title V Permit

46. The operator shall be in violation of this rule if any District inspection demonstrates that one or more of the conditions in Sections 5.1.4 exist at the facility. [District Rule 4455, 5.1.3.1] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

47. Except for annual operator inspection described in Section 5.1.3.2.3, any operator inspection that demonstrates one or more of the conditions in Section 5.1.4 exist at the facility shall not constitute a violation of this rule if the leaking components are repaired as soon as practicable but not later than the time frame specified in this rule. Such components shall not be counted towards determination of compliance with the provisions of Section 5.1.4. [District Rule 4455, 5.1.3.2.1] Federally Enforceable Through Title V Permit

48. Leaking components detected during operator inspection pursuant Section 5.1.3.2.1 that are not repaired, replaced, or removed from operation as soon as practicable but not later than the time frame specified in this rule shall be counted toward determination of compliance with the provisions of Section 5.1.4. [District Rule 4455, 5.1.3.2.2] Federally Enforceable Through Title V Permit

49. Any operator inspection conducted annually for a component type (including operator annual inspections pursuant to Section 5.2.5, 5.2.6, 5.2.7, or 5.2.8) that demonstrates one or more of the conditions in Section 5.1.4 exist at the facility shall constitute a violation of this rule regardless of whether or not the leaking components are repaired, replaced, or removed from operation within the allowable repair time frame specified in this rule. [District Rule 4455, 5.1.3.2.3] Federally Enforceable Through Title V Permit

50. A component shall be considered leaking if one of more of the conditions specified in Sections 5.1.4.1 through 5.1.4.4 of the rule exist at the facility. [District Rule 4455, 5.1.4] Federally Enforceable Through Title V Permit

51. The operator shall audio-visually inspect for leaks all accessible operating pumps, compressors and PRD in service at least once every 24 hours, except when operators do not report to the facility for that given 24 hours. Any identified leak that cannot be immediately repaired shall be reinspected within 24 hours using EPA Method 21. If a leak is found, it shall be repaired as soon as practical but not later than the time frame specified in Table 3 of the rule. [District Rule 4455, 5.2.1 & 5.2.2] Federally Enforceable Through Title V Permit

52. The operator shall inspect all components at least once every calendar quarter, except for inaccessible components, unsafe-to-monitor components and pipes. Inaccessible components, unsafe-to-monitor components and pipes shall be inspected in accordance with the requirements set forth in Sections 5.2.5, 5.2.6, and 5.2.7. New, replaced, or repaired fittings, flanges and threaded connections shall be inspected immediately after being placed into service. [District Rule 4455, 5.2.3, 5.2.4, 5.2.5, 5.2.6 & 5.2.7] Federally Enforceable Through Title V Permit

53. The operator may apply for a written approval from the APCO to change the inspection frequency from quarterly to annually for a component type, provided the operator meets all the criteria specified in Sections 5.2.8.1 through 5.2.8.3 of the rule. This approval shall apply to accessible component types, specifically designated by the APCO, except pumps, compressors, and PRDs which shall continue to be inspected on a quarterly basis. [District Rule 4455, 5.2.8] Federally Enforceable Through Title V Permit

54. An annual inspection frequency approved by the APCO shall revert to quarterly inspection frequency for a component type if either the operator inspection or District inspection demonstrates that a violation of the provisions of Sections 5.1, 5.2 and 5.3 of the rule exists for that component type, or the APCO issued a Notice of Violation for violating any of the provisions of this rule during the annual inspection period for that component type. When the inspection frequency changes from annual to quarterly inspections, the operator shall notify the APCO in writing within five (5) calendar days after changing the inspection frequency, giving the reason(s) and date of change to quarterly inspection frequency. [District Rule 4455, 5.2.9 & 5.2.10] Federally Enforceable Through Title V Permit

55. The operator shall initially inspect a process PRD that releases to the atmosphere as soon as practicable but not later than 24 hours after the time of the release. To insure that the process PRD is operating properly, and is leak-free, the operator shall re-inspect the process PRD not earlier than 24 hours after the initial inspection but not later than 15 calendar days after the date of the release using EPA Method 21. If the process PRD is found to be leaking at either inspection, the PRD leak shall be treated as if the leak was found during quarterly operator inspections. [District Rule 4455, 5.2.11] Federally Enforceable Through Title V Permit

56. Except for process PRD, a component shall be inspected within 15 calendar days after repairing the leak or replacing the component using EPA Method 21. [District Rule 4455, 5.2.12] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

57. A District inspection in no way fulfills any of the mandatory inspection requirements that are placed upon operators and cannot be used or counted as an inspection required of an operator. Any attempt by an operator to count such District inspections as part of the mandatory operator's inspections is considered to be willful circumvention and is a violation of this rule. [District Rule 4455, 5.2.13] Federally Enforceable Through Title V Permit

58. Upon detection of a leaking component, the operator shall affix to that component a weatherproof readily visible tag that contains the information specified in Section 5.3.3. The tag shall remain affixed to the component until the leaking component has been repaired or replaced; has been re-inspected; and is found to be in compliance with the requirements of this rule. [District Rule 4455, 5.3.1, 5.3.2 & 5.3.3] Federally Enforceable Through Title V Permit

59. An operator shall minimize all component leaks immediately to the extent possible, but not later than one (1) hour after detection of leaks in order to stop or reduce leakage to the atmosphere. [District Rule 4455, 5.3.4] Federally Enforceable Through Title V Permit

60. If the leak has been minimized but the leak still exceeds the applicable leak standards of this rule, an operator shall repair or replace the leaking component, vent the leaking component to a closed vent system, or remove the leaking component from operation as soon as practicable but not later than the time period specified in Table 3. For each calendar quarter, the operator may be allowed to extend the repair period as specified in Table 3, for a total number of leaking components, not to exceed 0.05 percent of the number of components inspected, by type, rounded upward to the nearest integer where required. [District Rule 4455, 5.3.5] Federally Enforceable Through Title V Permit

61. If the leaking component is an essential component or a critical component and which cannot be immediately shut down for repairs, the operator shall minimize the leak within one hour after detection of the leak. If the leak has been minimized, but the leak still exceeds any of the applicable leak standards of this rule, the essential component or critical component shall be repaired or replaced to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection, whichever comes earlier. [District Rule 4455, 5.3.6] Federally Enforceable Through Title V Permit

62. For any component that has incurred five repair actions for major gas leaks or major liquid leaks, or any combination of major gas leaks and major liquid leaks within a continuous 12-month period, the operator shall comply with at least one of the requirements specified in Sections 5.3.7.1, 5.3.7.2, 5.3.7.3, or 5.3.7.4 by the applicable deadlines specified in Sections 5.3.7.5 and 5.3.7.6. If the original leaking component is replaced with a new like-in-kind component before incurring five repair actions for major leaks within 12-consecutive months, the repair count shall start over for the new component. An entire compressor or pump need not be replaced provided the compressor part(s) or pump part(s) that have incurred five repair actions as described in Section 5.3.7 are brought into compliance with at least one of the requirements of Sections 5.3.7.1 through 5.3.7.6. [District Rule 4455, 5.3.7] Federally Enforceable Through Title V Permit

63. The operator shall monitor process PRD by using electronic process control instrumentation that allows for real time continuous parameter monitoring or by using telltale indicators for the process PRD where parameter monitoring is not feasible. [District Rule 4455, 5.4.1] Federally Enforceable Through Title V Permit

64. After a release from a process PRD in excess of 500 pounds of VOC in a continuous 24-hour period, the operator shall immediately conduct a failure analysis and implement corrective actions as soon as practicable but not later than 30 days to prevent the reoccurrence of similar release. For refineries processing greater than 20,000 barrels of crude oil per day, any subsequent release in excess of 500 pounds of VOC within a continuous 24-hour period shall be subject to the requirements of Section 5.4.5. [District Rule 4455, 5.4.3 & 5.4.4] Federally Enforceable Through Title V Permit

65. The operator of a refinery processing greater than 20,000 barrels of crude oil per day shall connect all process PRDs serving that process equipment to an APCO-approved closed vent system as defined in Section 3.0 if any of the conditions specified in Sections 5.4.5.1 and 5.4.5.2 occurs. Process PRDs subject to the provisions of Section 5.4.5 shall be connected to an APCO-approved closed-vent system as soon as practicable, but no later than the first turnaround after the requirement to connect becomes effective. [District Rule 4455, 5.4.5] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

66. All major components and critical components shall be physically identified clearly and visibly for inspection, repair, and recordkeeping purposes. The physical identification shall consist of labels, tags, manufacturer's nameplate identifier, serial number, or model number, or other system approved by the APCO that enables an operator or District personnel to locate each individual component. The operator shall replace tags or labels that become missing or unreadable as soon as practicable but not later than 24 hours after discovery. The operator shall comply with the requirements of Sections 6.1.4 if there is any change in the description of major components or critical components. [District Rule 4455, 5.5.1 & 5.5.2] Federally Enforceable Through Title V Permit

67. The operator shall keep a copy of the operator management plan at the facility and make it available to the APCO, ARB and US EPA upon request. By January 30 of each year, the operator shall submit to the APCO for approval, in writing, an annual report indicating any changes to the existing, approved operator management plan. [District Rule 4455, 6.1.2 & 6.1.4] Federally Enforceable Through Title V Permit

68. The operator shall maintain an inspection log containing, at a minimum, 1) total number of components inspected, and total number and percentage of leaking components found by component types, 2) location, type, name or description of each leaking component, and description of any unit where the leaking component is found, 3) date of leak detection and method of leak detection, 4) for gaseous leaks, record the leak concentration in ppmv, and for liquid leaks record whether the leak is a major liquid leak or a minor liquid leak, 5) date of repair, replacement, or removal from operation of leaking components, 6) identification and location of essential component and critical components found leaking that cannot be repaired until the next process unit turnaround or not later one year after leak detection, whichever comes earlier, 7) methods used to minimize the leak from essential components and critical components that cannot be repaired until the next process unit turnaround or not later one year after leak detection, whichever comes earlier, 8) after the component is repaired or is replaced, the date of reinspection and the leak concentration in ppmv, 9) inspector's name, business mailing address, and business telephone number, and 10) the facility operator responsible for the inspection and repair program shall sign and date the inspection log certifying the accuracy of the information recorded in the log. [District Rule 4455, 6.2.1] Federally Enforceable Through Title V Permit

69. Records of each calibration of the portable hydrocarbon detection instrument utilized for inspecting components, including a copy of current calibration gas certification from the vendor of said calibration gas cylinder, the date of calibration, concentration of calibration gas, analyzer reading of calibration gas before adjustment, instrument reading of calibration gas after adjustment, calibration gas expiration date, and calibration gas cylinder pressure at the time of calibration. [District Rule 4455, 6.2.3] Federally Enforceable Through Title V Permit

70. The operator shall notify the APCO, by telephone or other methods approved by the APCO, of any process PRD release described in Sections 5.4.4 and 5.4.5, and any release in excess of the reportable quantity limits as stipulated in 40 CFR, Part 117, Part 302 and Part 355, including any release in excess of 100 pounds of VOC, within one hour of such occurrence or within one hour of the time said person knew or reasonably should have known of its occurrence. [District Rule 4455, 6.3.1] Federally Enforceable Through Title V Permit

71. The operator shall submit a written report to the APCO within thirty (30) calendar days following a PRD release subject to 6.3.1. The written report shall include 1) process PRD type, size, and location, 2) date, time and duration of the process PRD release, 3) types of VOC released and individual amounts, in pounds, including supporting calculations, 4) cause of the process PRD release, and 5) corrective actions taken to prevent a subsequent process PRD release. [District Rule 4455 6.3.2] Federally Enforceable Through Title V Permit

72. Copies of all records shall be retained for a minimum of five (5) years after the date of an entry. Such records shall be made available to the APCO, ARB, or US EPA upon request. [District Rule 4455, 6.2.2, 6.2.3 & 6.2.4] Federally Enforceable Through Title V Permit

73. Equivalent test methods other than specified in Sections 6.4.1 through 6.4.5 may be used provided such test methods have received prior approval from the US EPA, ARB, and APCO. [District Rule 4455, 6.4] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

74. Measurements of gaseous leak concentrations shall be conducted according to US EPA Method 21 using an appropriate portable hydrocarbon detection instrument calibrated with methane. The instrument shall be calibrated in accordance with the procedures specified in US EPA Method 21 or the manufacturer's instruction, as appropriate, not more than 30 days prior to its use. The operator shall record the calibration date of the instrument. [District Rule 4455, 6.4.1] Federally Enforceable Through Title V Permit

75. The VOC content shall be determined using American Society of Testing and Materials (ASTM) D 1945 for gases and South Coast Air Quality Management District (SCAQMD) Method 304 for liquids. [District Rule 4455, 6.4.2] Federally Enforceable Through Title V Permit

76. The percent by volume liquid evaporated at 150 C shall be determined using ASTM D 86. [District Rule 4455, 6.4.3] Federally Enforceable Through Title V Permit

77. The control efficiency of any VOC control device, measured and calculated as carbon, shall be determined by US EPA Method 25, except when the outlet concentration must be below 50 ppm in order to meet the standard, in which case Method 25a may be used. US EPA Method 18 may be used in lieu of US EPA Method 25 or US EPA Method 25a provided the identity and approximate concentrations of the analytes/compounds in the sample gas stream are known before analysis with the gas chromatograph and the gas chromatograph is calibrated for each of those known analyte/compound to ensure that the VOC concentrations are neither under- or over-reported. [District Rule 4455, 6.4.4] Federally Enforceable Through Title V Permit

78. Halogenated exempt compounds shall be analyzed by US EPA Method 18 or ARB Method 422 "Determination of Volatile Organic Compounds in Emission from Stationary Sources". [District Rule 4455, 6.4.5] Federally Enforceable Through Title V Permit

Appendix B
Compliance Certification Form

RECEIVED

MAY - 9 2016

SJVAPCD
Southern Region

San Joaquin Valley
Unified Air Pollution Control District

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

[ ] SIGNIFICANT PERMIT MODIFICATION
[X] MINOR PERMIT MODIFICATION
[ ] ADMINISTRATIVE AMENDMENT

COMPANY NAME: Alon USA	FACILITY ID: S - 33
1. Type of Organization:[X] Corporation [ ] Sole Ownership [ ] Government [ ] Partnership [ ] Utility	
2. Owner's Name: **Alon USA**	
3. Agent to the Owner:	

II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial **all** circles for confirmation):

HO Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).

HO Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.

HO Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.

HO Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:

Helen Ordway
Signature of Responsible Official

May 4, 2016
Date

Helen Ordway
Name of Responsible Official (please print)

Environmental Manager
Title of Responsible Official (please print)

Mailing Address: Central Regional Office * 1990 E. Gettysburg Avenue * Fresno, California 93726-0244 * (559) 230-5900 * FAX (559) 230-6061

Appendix C
Draft ATC

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

PERMIT NO: S-33-18-12 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: ALON BAKERSFIELD REFINING
MAILING ADDRESS: 6451 ROSEDALE HWY
BAKERSFIELD, CA 93308

LOCATION: 6451 ROSEDALE HWY (AREA 1 & 2)
BAKERSFIELD, CA 93308

SECTION: 27 **TOWNSHIP:** 29S **RANGE:** 27E

EQUIPMENT DESCRIPTION:
MODIFICATION OF AREA 1 FLARE (74Y-1, NORTH) W/AUTOMATIC STEAM INJECTION CONTROL, KNOCKOUT DRUM, CHEMICAL INJECTION H2S REMOVAL SYSTEM CONNECTED TO FLARE GAS SUPPLY LINE, & WATER SEAL DRUM DOWNSTREAM OF FLARE KNOCKOUT DRUM: DESIGNATE AS A DORMANT EMISSIONS UNIT

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. While dormant, the flare shall be disconnected from all the equipment it serves and the pilot gas line shall be disconnected. [District Rule 2080]
4. {4562} Permittee shall submit written notification to the District upon designating the unit as dormant or active. [District Rule 2080]
5. {4560} While dormant, normal source testing shall not be required. [District Rule 2080]
6. {4563} Upon recommencing operation of this unit, normal source testing shall resume. [District Rule 2080]
7. {4564} Any source testing required by this permit shall be performed within 60 days of recommencing operation of this unit, regardless of whether the unit remains active or is again designated as dormant. [District Rule 2080]

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

Arnaud Marjollet, Director of Permit Services
S-33-18-12 : Jul 7 2016 11:04AM -- RINALDIR : Joint Inspection NOT Required

8. {4565} Records of all dates and times that this unit is designated as dormant or active, and copies of all corresponding notices to the District, shall be maintained, retained for a period of at least five years, and made available for District inspection upon request. [District Rule 1070]

9. Flare gas inlet piping shall be equipped with a secondary hydrogen sulfide (H2S) removal system, including H2S scavenger chemical injection pumps, chemical storage/injection tank, piping, and pressure vessels. [District NSR Rule] Federally Enforceable Through Title V Permit

10. Water seal drum located downstream of the flare knockout equipped with flare bypass piping to 2 compressors discharging to amine treater, unit #15 (S-33-14). At least one of the compressors shall be in operation whenever the flare is operational. [District NSR Rule] Federally Enforceable Through Title V Permit

11. Permittee shall immediately notify the District of any change in manufacturer or formulation of scrubbing agents used at the secondary hydrogen sulfide (H2S) removal system, and shall submit MSDS for new scrubbing agent within one (1) week of change. [District NSR Rule] Federally Enforceable Through Title V Permit

12. Leaks from valves and connectors associated with flare gas bypass equipment and subject to the provisions of Rule 4455 (Adopted 4/20/05) shall be defined as a reading of methane on a portable hydrocarbon detection instrument in excess of 100 ppmv above background when measured one (1) cm from potential source. [District NSR Rule] Federally Enforceable Through Title V Permit

13. Leaks from pump and compressor seals associated with flare gas bypass equipment and subject to the provisions of Rule 4455 (Adopted 4/20/05) shall be defined as a reading of methane on a portable hydrocarbon detection instrument in excess of 500 ppmv above background when measured one (1) cm from potential source. [District NSR Rule] Federally Enforceable Through Title V Permit

14. Permittee shall maintain accurate records of number of fugitive emissions components and calculated fugitive emissions using U.S. EPA publication 453/R-95-017, section 2.3.1, and a control efficiency of 95% for pumps and compressor seals and a control efficiency of 99% for valves and connectors for all components subject to the 100 and 500 ppmv fugitive leak criteria. [District Rule 1070 and 2520, 9.3.2] Federally Enforceable Through Title V Permit

15. Flare gas bypass compressors shall be designated, as described in section 60.486(e) (1) and (2) for no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background. The reading shall be measured by the methods specified in section 60.485(c). Compressors shall be tested initially, annually thereafter, and at other times as requested by the District. [District Rule 4001, Subpart GGG] Federally Enforceable Through Title V Permit

16. During normal operation, sour gas (H2S content greater than 0.1 gr/dscf) must be diverted from the flare by the water seal drum and directed to the Area 1 or Area 3 amine treatment unit. Sweet refinery fuel gas (0.1 gr/dscf or less) may be introduced to the flare downstream of the water seal prior to the flow meter and hydrogen sulfide analyzer. [District Rule 2010] Federally Enforceable Through Title V Permit

17. Emissions from the flare shall not exceed 0.068 lb/MMBtu for NOx. [District NSR Rule] Federally Enforceable Through Title V Permit

18. All records required by this permit shall be maintained on site for period of at least five years and shall be made available for District inspection upon request. [District Rule 1070 and 2520, 9.4.2] Federally Enforceable Through Title V Permit

19. Operator shall report all rolling 3-hour periods during which the average concentration of H2S as measured by the H2S continuous monitoring system exceeds 0.10 gr/dscf (230 mg/dscm). [40 CFR Part 60, subpart J, 60.105(e)(3)(ii)] Federally Enforceable Through Title V Permit

20. Operator shall determine compliance with the H2S standard using EPA Method 11. [40 CFR Part 60, subpart J, 60.106(e)] Federally Enforceable Through Title V Permit

21. Sulfur content (as H2S) of fuel gas, as defined in Rule 4001 Subpart J, burned in flare shall not exceed 0.10 gr/dscf. [40 CFR 60, Subpart J] Federally Enforceable Through Title V Permit

22. Continuous emissions monitoring system shall be installed, calibrated, operated, and reported according to EPA guidelines as specified under 40 CFR 60, Subpart J, Specification 7, and general requirements. CEM results shall be calculated on a rolling three (3) hour basis. [40 CFR 60, Subpart J] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

23. Visible emissions monitoring shall be conducted at least annually, using EPA Method 22. [40CFR 60.18(f)(1)] Federally Enforceable Through Title V Permit

24. The flame shall be present at all times when combustible gases are vented through the flare. [District Rule 4311, 5.2 and 40CFR 60.18(c)(2)] Federally Enforceable Through Title V Permit

25. The outlet shall be equipped with an automatic ignition system, or, shall operate with a pilot flame present at all times when combustible gases are vented through the flare, except during purge periods for automatic-ignition equipped flares. [District Rule 4311, 5.3 and 40CFR 60.18(f)(2)] Federally Enforceable Through Title V Permit

26. Except for flares equipped with a flow-sensing ignition system, a heat sensing device such as a thermocouple, ultraviolet beam sensor, infrared sensor, or an equivalent device, capable of continuously detecting at least one pilot flame or the flare flame is present shall be installed and operated. [District Rule 4311, 5.4 and 40CFR 60.18(f)(2)] Federally Enforceable Through Title V Permit

27. Flares that use flow-sensing automatic ignition systems and which do not use a continuous flame pilot shall use purge gas for purging. [District Rule 4311, 5.5] Federally Enforceable Through Title V Permit

28. Open flares in which the flare gas pressure is less than 5 psig shall be operated in such a manner that meets the provisions of 40 CFR 60.18. [District Rule 4311, 5.6] Federally Enforceable Through Title V Permit

29. Flaring is prohibited unless it is consistent with an approved flare minimization plan (FMP), and all commitments listed in that plan have been met. This standard shall not apply if the APCO determines that the flaring is caused by an emergency and is necessary to prevent an accident, hazard or release of vent gas directly to the atmosphere. [District Rule 4311, 5.8] Federally Enforceable Through Title V Permit

30. The operator shall minimize sulfur dioxide flare emissions to less than 1.50 tons per million barrels of petroleum processing capacity, calculated as an average over one calendar year. [District Rule 4311, 5.9.1] Federally Enforceable Through Title V Permit

31. The operator shall monitor the vent gas flow to the flare with a flow measuring device. [District Rule 4311, 5.10] Federally Enforceable Through Title V Permit

32. The operator shall maintain and retain on-site for a minimum of five years, and made available to the APCO, ARB, and EPA a copy of the approved flare minimization plan, a copy of annual reports submitted to the District, and all applicable flare monitoring data collected as required by this permit. [District Rule 4311, 6.1] Federally Enforceable Through Title V Permit

33. The operator of a flare subject to flare minimization shall notify the APCO of an unplanned flaring event within 24 hours after the start of the next business day or within 24 hours of their discovery, which ever occurs first. The notification shall include the flare source identification, the start date and time, and the end date and time. An "unplanned flaring event" is any flaring event that does not meet the definition of "planned flaring" as defined in District Rule 4311 (Amended June 18, 2009). [District Rule 4311, 6.2] Federally Enforceable Through Title V Permit

34. Effective on and after July 1, 2012, and annually thereafter, the operator of a flare subject to flare minimization shall submit an annual report to the APCO that summarizes all Reportable Flaring Events as defined in Section 3.0 that occurred during the previous 12 month period. The report shall be submitted within 30 days following the end of the twelve month period of the previous year. The report shall include, but is not limited to all of the following: the results of an investigation to determine the primary cause and contributing factors of the flaring event; any prevention measures considered or implemented to prevent recurrence together with a justification for rejecting any measures that were considered but not implemented; if appropriate, an explanation of why the flaring was an emergency and necessary to prevent accident, hazard or release of vent gas to the atmosphere, or where, due to a regulatory mandate to vent a flare, it cannot be recovered, treated and used as a fuel gas at the facility; and the date, time, and duration of the flaring event. [District Rule 4311, 6.2.2] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

35. Effective on and after July 1, 2012, and annually thereafter, the operator of a flare subject to flare monitoring requirements shall submit an annual report to the APCO within 30 days following the end of each 12 month period. The report shall include the following: the total volumetric flow of vent gas in standard cubic feet for each day; hydrogen sulfide content, methane content, and hydrocarbon content of vent gas composition; if vent gas composition is monitored by a continuous analyzer or analyzers, average total hydrocarbon content by volume, average methane content by volume, and depending upon the analytical method used, total reduced sulfur content by volume or hydrogen sulfide content by volume of vent gas flared for each hour of the month; if the flow monitor used measures molecular weight, the average molecular weight for each hour of each month; for any pilot and purge gas used, the type of gas used, the volumetric flow for each day and for each month; and the means used to determine flow; flare monitoring system downtime periods, including dates and times; for each day and for each month provide calculated sulfur dioxide emissions; and a flow verification report for each flare subject to this rule. The flow verification report shall include flow verification testing. [District Rule 4311, 6.2.3] Federally Enforceable Through Title V Permit

36. Total hydrocarbon content and methane content of vent gas shall be determined using ASTM Method D 1945-96, ASTM Method UOP 539-97, EPA Method 18, or EPA Method 25A or 25B. [District Rule 4311, 6.3.4.1] Federally Enforceable Through Title V Permit

37. Vent gas flow shall be determined using a verification method recommended by the manufacturer of the flow monitoring equipment installed. [District Rule 4311, 6.3.5.2] Federally Enforceable Through Title V Permit

38. The operator shall monitor sulfur content of the vent gas to the flare using a colorimetric tube system on a daily basis, and monitor vent gas hydrocarbon on a weekly basis by collecting samples and having them tested. [District Rule 4311, 6.6.5] Federally Enforceable Through Title V Permit

39. The operator shall provide the APCO with access to the flare monitoring system to collect the vent gas samples. [District Rule 4311, 6.6.7] Federally Enforceable Through Title V Permit

40. The operator shall monitor the volumetric flows of the flare's purge and pilot gases with flow measuring devices or other parameters as specified on the Permit to Operate so that volumetric flows of pilot and purge gas may be calculated based on pilot design and the parameters monitored. [District Rule 4311, 6.7] Federally Enforceable Through Title V Permit

41. The operator shall monitor and record the water level and pressure of the water seal that services the flare daily. [District Rule 4311, 6.8] Federally Enforceable Through Title V Permit

42. The operator shall report periods of flare monitoring system inoperation greater than 24 continuous hours by the following working day, followed by notification of resumption of monitoring. Periods of inoperation of monitoring equipment shall not exceed 14 days per any 18-consecutive-month period. Periods of flare monitoring system inoperation do not include the periods when the system feeding the flare is not operating. [District Rule 4311, 6.9.1] Federally Enforceable Through Title V Permit

43. The operator shall install and maintain equipment that records a real-time digital image of the flare and flame at a frame rate of no less than one frame per minute. The recorded image of the flare shall be of sufficient size, contrast, and resolution to be readily apparent in the overall image or frame. The image shall include an embedded date and time stamp. The equipment shall archive the images for each 24-hour period. In lieu of video monitoring the operator may use an alternative monitoring method that provides data to verify date, time, vent gas flow, and duration of flaring events. [District Rule 4311, 6.10] Federally Enforceable Through Title V Permit

44. The flare shall be operated according to the manufacturer's specifications, a copy of which shall be maintained on site. [District Rule 40CFR 60.18(d)] Federally Enforceable Through Title V Permit

45. The actual exit velocity of a flare shall be determined by dividing the volumetric flowrate (in units of standard temperature and pressure), as determined by Reference Methods 2, 2A, 2C, or 2D as appropriate; by the unobstructed (free) cross sectional area of the flare tip. [40 CFR 60.18 (f)(4)] Federally Enforceable Through Title V Permit

46. Air-assisted or steam-assisted flares shall only be used when the net heating value of the gas being combusted is 300 Btu/scf or greater. Nonassisted flares shall only be used when the net heating value of the gas being combusted is 200 Btu/scf or greater. [40 CFR 60.18 (c)(3)(ii)] Federally Enforceable Through Title V Permit

47. Steam-assisted and nonassisted flares shall be operated with an exit velocity less than 60 ft/sec, except as provided in 40 CFR 60.18 (c)(4)(ii) and (iii). [40 CFR 60.18 (c)(4)(i)] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

48. Steam-assisted and nonassisted flares may be operated with an exit velocity equal to or greater than 60 ft/sec, but less than 400 ft/sec, if the net heating value of the gas being combusted is greater than 1,000 Btu/scf. [40 CFR 60.18 (c)(4)(ii)] Federally Enforceable Through Title V Permit

49. Steam-assisted and nonassisted flares may be operated with an exit velocity less than the velocity Vmax, as determined by the methods specified in 40 CFR 60.18 (f)(5), and less than 400 ft/sec. [40 CFR 60.18 (c)(4)(iii)] Federally Enforceable Through Title V Permit

50. The net heating value of the gas being combusted the flare shall be calculated pursuant to 40 CFR 60.18(f)(3) or by using EPA Method 18, ASTM D1946, and ASTM D2382 if published values are not available or cannot be calculated. [40 CFR 60.18 (f)(3)] Federally Enforceable Through Title V Permit

51. Except for complying with the applicable requirements of Sections 6.1 and 7.3, the requirements of this rule shall not apply to 1) components subject to Rule 4623 (adopted 5/19/05), 2) pressure relief devices, pumps, and compressors equipped with a closed vent system as defined in Section 3.0, 3) components buried below ground, 4) components exclusively handling liquid streams which have less than 10 percent by weight (<10 wt%) evaporation at 150 C, 5) components exclusively handling liquid streams with a VOC content less than ten percent by weight (<10 wt%), 6) components exclusively handling gas/vapor streams with a VOC content of less than one percent by weight (<1wt%), 7) components incorporated in lines exclusively in vacuum service, 8) components exclusively handling commercial natural gas, and 9) one-half inch nominal or less stainless steel tube fittings which have been demonstrated to the Air Pollution Control Officer (APCO) to be leak-free based on initial inspection. [District Rule 4455, 4.1 & 4.2] Federally Enforceable Through Title V Permit

52. The operator shall not use any component that leaks in excess of the allowable leak standards of this rule, or is found to be in violation of the provisions specified in Section 5.1.3. A component identified as leaking in excess of an allowable leak standard may be used provided it has been identified with a tag for repair, has been repaired, or is awaiting re-inspection after repair, within the applicable time period specified within the rule. [District Rule 4455, 5.1.1] Federally Enforceable Through Title V Permit

53. Each hatch shall be closed at all times except during sampling or adding of process material through the hatch, or during attended repair, replacement, or maintenance operations, provided such activities are done as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4455, 5.1.2] Federally Enforceable Through Title V Permit

54. The operator shall be in violation of this rule if any District inspection demonstrates that one or more of the conditions in Sections 5.1.4 exist at the facility. [District Rule 4455, 5.1.3.1] Federally Enforceable Through Title V Permit

55. Except for annual operator inspection described in Section 5.1.3.2.3, any operator inspection that demonstrates one or more of the conditions in Section 5.1.4 exist at the facility shall not constitute a violation of this rule if the leaking components are repaired as soon as practicable but not later than the time frame specified in this rule. Such components shall not be counted towards determination of compliance with the provisions of Section 5.1.4. [District Rule 4455, 5.1.3.2.1] Federally Enforceable Through Title V Permit

56. Leaking components detected during operator inspection pursuant Section 5.1.3.2.1 that are not repaired, replaced, or removed from operation as soon as practicable but not later than the time frame specified in this rule shall be counted toward determination of compliance with the provisions of Section 5.1.4. [District Rule 4455, 5.1.3.2.2] Federally Enforceable Through Title V Permit

57. Any operator inspection conducted annually for a component type (including operator annual inspections pursuant to Section 5.2.5, 5.2.6, 5.2.7, or 5.2.8) that demonstrates one or more of the conditions in Section 5.1.4 exist at the facility shall constitute a violation of this rule regardless of whether or not the leaking components are repaired, replaced, or removed from operation within the allowable repair time frame specified in this rule. [District Rule 4455, 5.1.3.2.3] Federally Enforceable Through Title V Permit

58. A component shall be considered leaking if one of more of the conditions specified in Sections 5.1.4.1 through 5.1.4.4 of the rule exist at the facility. [District Rule 4455, 5.1.4] Federally Enforceable Through Title V Permit

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59. The operator shall audio-visually inspect for leaks all accessible operating pumps, compressors and PRD in service at least once every 24 hours, except when operators do not report to the facility for that given 24 hours. Any identified leak that cannot be immediately repaired shall be reinspected within 24 hours using EPA Method 21. If a leak is found, it shall be repaired as soon as practical but not later than the time frame specified in Table 3 of the rule. [District Rule 4455, 5.2.1 & 5.2.2] Federally Enforceable Through Title V Permit

60. The operator shall inspect all components at least once every calendar quarter, except for inaccessible components, unsafe-to-monitor components and pipes. Inaccessible components, unsafe-to-monitor components and pipes shall be inspected in accordance with the requirements set forth in Sections 5.2.5, 5.2.6, and 5.2.7. New, replaced, or repaired fittings, flanges and threaded connections shall be inspected immediately after being placed into service. [District Rule 4455, 5.2.3, 5.2.4, 5.2.5, 5.2.6 & 5.2.7] Federally Enforceable Through Title V Permit

61. The operator may apply for a written approval from the APCO to change the inspection frequency from quarterly to annually for a component type, provided the operator meets all the criteria specified in Sections 5.2.8.1 through 5.2.8.3 of the rule. This approval shall apply to accessible component types, specifically designated by the APCO, except pumps, compressors, and PRDs which shall continue to be inspected on a quarterly basis. [District Rule 4455, 5.2.8] Federally Enforceable Through Title V Permit

62. An annual inspection frequency approved by the APCO shall revert to quarterly inspection frequency for a component type if either the operator inspection or District inspection demonstrates that a violation of the provisions of Sections 5.1, 5.2 and 5.3 of the rule exists for that component type, or the APCO issued a Notice of Violation for violating any of the provisions of this rule during the annual inspection period for that component type. When the inspection frequency changes from annual to quarterly inspections, the operator shall notify the APCO in writing within five (5) calendar days after changing the inspection frequency, giving the reason(s) and date of change to quarterly inspection frequency. [District Rule 4455, 5.2.9 & 5.2.10] Federally Enforceable Through Title V Permit

63. The operator shall initially inspect a process PRD that releases to the atmosphere as soon as practicable but not later than 24 hours after the time of the release. To insure that the process PRD is operating properly, and is leak-free, the operator shall re-inspect the process PRD not earlier than 24 hours after the initial inspection but not later than 15 calendar days after the date of the release using EPA Method 21. If the process PRD is found to be leaking at either inspection, the PRD leak shall be treated as if the leak was found during quarterly operator inspections. [District Rule 4455, 5.2.11] Federally Enforceable Through Title V Permit

64. Except for process PRD, a component shall be inspected within 15 calendar days after repairing the leak or replacing the component using EPA Method 21. [District Rule 4455, 5.2.12] Federally Enforceable Through Title V Permit

65. A District inspection in no way fulfills any of the mandatory inspection requirements that are placed upon operators and cannot be used or counted as an inspection required of an operator. Any attempt by an operator to count such District inspections as part of the mandatory operator's inspections is considered to be willful circumvention and is a violation of this rule. [District Rule 4455, 5.2.13] Federally Enforceable Through Title V Permit

66. Upon detection of a leaking component, the operator shall affix to that component a weatherproof readily visible tag that contains the information specified in Section 5.3.3. The tag shall remain affixed to the component until the leaking component has been repaired or replaced; has been re-inspected; and is found to be in compliance with the requirements of this rule. [District Rule 4455, 5.3.1, 5.3.2 & 5.3.3] Federally Enforceable Through Title V Permit

67. An operator shall minimize all component leaks immediately to the extent possible, but not later than one (1) hour after detection of leaks in order to stop or reduce leakage to the atmosphere. [District Rule 4455, 5.3.4] Federally Enforceable Through Title V Permit

68. If the leak has been minimized but the leak still exceeds the applicable leak standards of this rule, an operator shall repair or replace the leaking component, vent the leaking component to a closed vent system, or remove the leaking component from operation as soon as practicable but not later than the time period specified in Table 3. For each calendar quarter, the operator may be allowed to extend the repair period as specified in Table 3, for a total number of leaking components, not to exceed 0.05 percent of the number of components inspected, by type, rounded upward to the nearest integer where required. [District Rule 4455, 5.3.5] Federally Enforceable Through Title V Permit

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69. If the leaking component is an essential component or a critical component and which cannot be immediately shut down for repairs, the operator shall minimize the leak within one hour after detection of the leak. If the leak has been minimized, but the leak still exceeds any of the applicable leak standards of this rule, the essential component or critical component shall be repaired or replaced to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection, whichever comes earlier. [District Rule 4455, 5.3.6] Federally Enforceable Through Title V Permit

70. For any component that has incurred five repair actions for major gas leaks or major liquid leaks, or any combination of major gas leaks and major liquid leaks within a continuous 12-month period, the operator shall comply with at least one of the requirements specified in Sections 5.3.7.1, 5.3.7.2, 5.3.7.3, or 5.3.7.4 by the applicable deadlines specified in Sections 5.3.7.5 and 5.3.7.6. If the original leaking component is replaced with a new like-in-kind component before incurring five repair actions for major leaks within 12-consecutive months, the repair count shall start over for the new component. An entire compressor or pump need not be replaced provided the compressor part(s) or pump part(s) that have incurred five repair actions as described in Section 5.3.7 are brought into compliance with at least one of the requirements of Sections 5.3.7.1 through 5.3.7.6. [District Rule 4455, 5.3.7] Federally Enforceable Through Title V Permit

71. The operator shall monitor process PRD by using electronic process control instrumentation that allows for real time continuous parameter monitoring or by using telltale indicators for the process PRD where parameter monitoring is not feasible. [District Rule 4455, 5.4.1] Federally Enforceable Through Title V Permit

72. After a release from a process PRD in excess of 500 pounds of VOC in a continuous 24-hour period, the operator shall immediately conduct a failure analysis and implement corrective actions as soon as practicable but not later than 30 days to prevent the reoccurrence of similar release. For refineries processing greater than 20,000 barrels of crude oil per day, any subsequent release in excess of 500 pounds of VOC within a continuous 24-hour period shall be subject to the requirements of Section 5.4.5. [District Rule 4455, 5.4.3 & 5.4.4] Federally Enforceable Through Title V Permit

73. The operator of a refinery processing greater than 20,000 barrels of crude oil per day shall connect all process PRDs serving that process equipment to an APCO-approved closed vent system as defined in Section 3.0 if any of the conditions specified in Sections 5.4.5.1 and 5.4.5.2 occurs. Process PRDs subject to the provisions of Section 5.4.5 shall be connected to an APCO-approved closed-vent system as soon as practicable, but no later than the first turnaround after the requirement to connect becomes effective. [District Rule 4455, 5.4.5] Federally Enforceable Through Title V Permit

74. All major components and critical components shall be physically identified clearly and visibly for inspection, repair, and recordkeeping purposes. The physical identification shall consist of labels, tags, manufacturer's nameplate identifier, serial number, or model number, or other system approved by the APCO that enables an operator or District personnel to locate each individual component. The operator shall replace tags or labels that become missing or unreadable as soon as practicable but not later than 24 hours after discovery. The operator shall comply with the requirements of Sections 6.1.4 if there is any change in the description of major components or critical components. [District Rule 4455, 5.5.1 & 5.5.2] Federally Enforceable Through Title V Permit

75. The operator shall keep a copy of the operator management plan at the facility and make it available to the APCO, ARB and US EPA upon request. By January 30 of each year, the operator shall submit to the APCO for approval, in writing, an annual report indicating any changes to the existing, approved operator management plan. [District Rule 4455, 6.1.2 & 6.1.4] Federally Enforceable Through Title V Permit

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76. The operator shall maintain an inspection log containing, at a minimum, 1) total number of components inspected, and total number and percentage of leaking components found by component types, 2) location, type, name or description of each leaking component, and description of any unit where the leaking component is found, 3) date of leak detection and method of leak detection, 4) for gaseous leaks, record the leak concentration in ppmv, and for liquid leaks record whether the leak is a major liquid leak or a minor liquid leak, 5) date of repair, replacement, or removal from operation of leaking components, 6) identification and location of essential component and critical components found leaking that cannot be repaired until the next process unit turnaround or not later one year after leak detection, whichever comes earlier, 7) methods used to minimize the leak from essential components and critical components that cannot be repaired until the next process unit turnaround or not later one year after leak detection, whichever comes earlier, 8) after the component is repaired or is replaced, the date of reinspection and the leak concentration in ppmv, 9) inspector's name, business mailing address, and business telephone number, and 10) the facility operator responsible for the inspection and repair program shall sign and date the inspection log certifying the accuracy of the information recorded in the log. [District Rule 4455, 6.2.1] Federally Enforceable Through Title V Permit

77. Records of each calibration of the portable hydrocarbon detection instrument utilized for inspecting components, including a copy of current calibration gas certification from the vendor of said calibration gas cylinder, the date of calibration, concentration of calibration gas, analyzer reading of calibration gas before adjustment, instrument reading of calibration gas after adjustment, calibration gas expiration date, and calibration gas cylinder pressure at the time of calibration. [District Rule 4455, 6.2.3] Federally Enforceable Through Title V Permit

78. The operator shall notify the APCO, by telephone or other methods approved by the APCO, of any process PRD release described in Sections 5.4.4 and 5.4.5, and any release in excess of the reportable quantity limits as stipulated in 40 CFR, Part 117, Part 302 and Part 355, including any release in excess of 100 pounds of VOC, within one hour of such occurrence or within one hour of the time said person knew or reasonably should have known of its occurrence. [District Rule 4455, 6.3.1] Federally Enforceable Through Title V Permit

79. The operator shall submit a written report to the APCO within thirty (30) calendar days following a PRD release subject to 6.3.1. The written report shall include 1) process PRD type, size, and location, 2) date, time and duration of the process PRD release, 3) types of VOC released and individual amounts, in pounds, including supporting calculations, 4) cause of the process PRD release, and 5) corrective actions taken to prevent a subsequent process PRD release. [District Rule 4455 6.3.2] Federally Enforceable Through Title V Permit

80. Copies of all records shall be retained for a minimum of five (5) years after the date of an entry. Such records shall be made available to the APCO, ARB, or US EPA upon request. [District Rule 4455, 6.2.2, 6.2.3 & 6.2.4] Federally Enforceable Through Title V Permit

81. Equivalent test methods other than specified in Sections 6.4.1 through 6.4.5 may be used provided such test methods have received prior approval from the US EPA, ARB, and APCO. [District Rule 4455, 6.4] Federally Enforceable Through Title V Permit

82. Measurements of gaseous leak concentrations shall be conducted according to US EPA Method 21 using an appropriate portable hydrocarbon detection instrument calibrated with methane. The instrument shall be calibrated in accordance with the procedures specified in US EPA Method 21 or the manufacturer's instruction, as appropriate, not more than 30 days prior to its use. The operator shall record the calibration date of the instrument. [District Rule 4455, 6.4.1] Federally Enforceable Through Title V Permit

83. The VOC content shall be determined using American Society of Testing and Materials (ASTM) D 1945 for gases and South Coast Air Quality Management District (SCAQMD) Method 304 for liquids. [District Rule 4455, 6.4.2] Federally Enforceable Through Title V Permit

84. The percent by volume liquid evaporated at 150 C shall be determined using ASTM D 86. [District Rule 4455, 6.4.3] Federally Enforceable Through Title V Permit

85. The control efficiency of any VOC control device, measured and calculated as carbon, shall be determined by US EPA Method 25, except when the outlet concentration must be below 50 ppm in order to meet the standard, in which case Method 25a may be used. US EPA Method 18 may be used in lieu of US EPA Method 25 or US EPA Method 25a provided the identity and approximate concentrations of the analytes/compounds in the sample gas stream are known before analysis with the gas chromatograph and the gas chromatograph is calibrated for each of those known analyte/compound to ensure that the VOC concentrations are neither under- or over-reported. [District Rule 4455, 6.4.4] Federally Enforceable Through Title V Permit

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86. Halogenated exempt compounds shall be analyzed by US EPA Method 18 or ARB Method 422 "Determination of Volatile Organic Compounds in Emission from Stationary Sources". [District Rule 4455, 6.4.5] Federally Enforceable Through Title V Permit